

6/13/2004

To: Paul Dabbs  
Mike Wade  
John Mills

From: Alex Hildebrand

The following comments on Surface Storage – CALFED in Volume 2 reflect both my own thoughts and comments received from John Mills.

- 1) The last two lines of the first paragraph on page 1 should be revised to read “-----long term comprehensive plan to restore ecological health and improve water management for beneficial uses of the state’s water system and environment within the CALFED solution area”.
- 2) The last bullet on page 1 should be revised to read “Millerton Lake enlargement or a functionally equivalent surface storage project in the region”. The reason for the change is to avoid possible interpretation to include the manner in which flood releases are managed or the use of the new storage space for purposes incompatible with water yield and flood control.
- 3) Following the next to last sentence on page one insert “However, if new surface storage projects premised on CALFED objectives, criteria, and processes can not be made feasible, those projects may be able to be redesigned or configured for local or regional objectives which make them feasible”. The existing last sentence would then also be revised and expanded to say “As CALFED storage project costs, environmental effects, and benefits are compiled, regulators, the public, and ultimately decision makers will be asked to respond to the evaluations and conclusions. This would be the appropriate time frame to consider some projects for release by CALFED and perhaps to allow them to be carried on in some form as local or regional proposals.”
- 4) Add at the end of the first paragraph on page 2, The significant capital cost of surface storage projects must be paid for over multiple decades. The CALFED

commitment to open ended obligations for projects and undefined operations criteria may make financing and partnering very difficult if not impossible. Should that occur, it may be prudent to examine these proposals as more modest, more focused, projects which serve local and regional needs independent of CALFED. If the surface storage proves to be important when operated primarily to meet needed future water supply, they may become state projects”.

5) At the end of the 3<sup>rd</sup> paragraph on page 2, it should read”----adopt the new assumptions in future studies. This evolving project definition may make finding willing financial partners difficult until a clear project purpose and level of obligation is firmed up”.

6) Page 3 under Potential Benefits from CALFED Surface Storage, second paragraph, states that the benefit from individual storage reservoirs could be anywhere from ‘a negligible amount to over 400,000 acre feet’. When compared to the water yield of existing reservoirs of comparable size, it seems doubtful that the 400,000 acre foot figure can be technically feasible. The DWR should ask to see a technical analysis to justify using this figure in the Water Plan. The figure can only be valid if the reservoir is filled with water that would otherwise flow to the Bay in excess of outflow requirements.

7) The paragraph following the one discussed in (6) asserts that “potential water supply improvements from implementation of all five surface storage projects is unknown”. How then can the 0.7 to 1.0 million acre foot yield be justified from CALFED surface storage in the table of Water Management objectives that appears several times in the Water Plan? The claim should be removed from the table.

8) On page five under Recommendations, 1., insert a new 3<sup>rd</sup> bullet to say

- “If one or more CALFED storage projects are determined to be unfeasible, those project sites and data collected should be supplied free of cost to local and regional interests who may wish to pursue modified projects.”